[Received via e-mail at 11:30 a.m. PDT on September 10, 2010]

Walla Walla County Public Works would like to comment on final termination procedures, outlined in S10. Notice of Termination (Page 33).

In eastern Washington, the most appropriate form of final stabilization generally consists of revegetating the site following completion of construction. For rural road projects, irrigation is unavailable, and seeding and planting the site will often fail if done before mid- to late-September. Summer thunderstorms will cause germination, and then subsequent dry weeks will kill the seedlings. For us, it is a hardship to be unable to close out a project (and receive reimbursement and/or reallocate funds) until fall if a project is completed in summer, as closing a project is contingent upon termination of our stormwater permit. We are requesting either an alternate means to achieve final stabilization, or some way to terminate the stormwater permit with the condition that hydroseeding or other revegetation is accomplished as soon as climate conditions are favorable.

Thank you for this opportunity to comment on the draft Construction Stormwater General Permit.

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